

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

KEITH SIEFERT,

Plaintiff,

v.

LIBERTY TOWNSHIP,

Defendant.

CASE NO:

JUDGE

**NOTICE OF REMOVAL OF CIVIL
ACTION**

Defendant, Liberty Township, by the undersigned attorney, respectfully state:

1. On July 12, 2022, the above-entitled action was commenced against the defendant in the Court of Common Pleas, Trumbull County, Ohio, Civil Division, Case No. 2022 CV 00952.

2. The complaint was served upon the defendant via certified mail on or about July 18, 2022.

3. On August 12, 2022, removing party filed an answer to the complaint.

4. No further proceedings have been had in the Court of Common Pleas, Trumbull County, Ohio, Civil Division.

5. The above-entitled cause of action is a civil action for money damages arising out of alleged violations of the Family Medical Leave Act (FMLA). In substance, the plaintiff claims that Liberty Township interfered “with the plaintiff’s asserting his rights under the FMLA in violation of 29 USC §2615(a)(1) when the plaintiff was terminated as a “maintenance supervisor” for Liberty Township.

6. This Court has original jurisdiction of the above-entitled action pursuant to 28 U.S.C. §1331, and this action may therefore be removed to this Court pursuant to 28 U.S.C. §1441(b).

7. A copy of the complaint served upon the defendant in the above-entitled action is attached hereto as Exhibit “A”, along with all the process, pleadings and orders served on the defendant in the above State Court action.

8. Pursuant to 28 U.S.C. §1446(b), this Petition is timely filed with this Court within 30 days after service on the defendant of the summons and complaint in the above-entitled action.

9. A copy of this Notice of Removal will be promptly filed with the state court, consistent with 28 U.S.C. §1446(d).

WHEREFORE, Notice is hereby given that the above-entitled action is removed from the Court of Common Pleas, Trumbull County, Ohio, Civil Division, to the United States District Court for the Northern District of Ohio.

Dated this 15th day of August, 2022.

Respectfully submitted,

/s/ Andrea K. Ziarko

Andrea K. Ziarko (0073755)

Gregory A. Beck (0018260)

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Counsel for Defendant, Liberty Township

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Further, a copy of the foregoing was served by email this 15th day of August, 2022, to:

Kristen M. Kraus, Esq.
Richard N. Selby II, Esq.
Counsel for Plaintiff

/s/ Andrea K. Ziarko
Andrea K. Ziarko (0073755)
Gregory A. Beck (0018260)